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U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF
NEW YORK

2023 OCT 17 P 2:02

**UNITED STATES BANKRUPTCY COURT RECEIVED
EASTERN DISTRICT OF NEW YORK**

In re: ANTHONY KERR
Debtor.

) Chapter [13]
) Case No.: 1-23-42356-NHL
)
) **OBJECTION TO TRUSTEE**
) **APPLICATION TO DISMISS**
BANKRUPTCY

TO THE HONORABLE NANCY HERSHEY LORD U.S. BANKRUPTCY JUDGE:

I, Anthony-Robert :Kerr, Attorney in Fact for, ANTHONY KERR, debtor in the above caption estate, hereby object to the Application to Dismiss Chapter 13 Bankruptcy in its entirety for the following reasons:

1. Nathan Z Kaufman, Staff Attorney is not a party to this action and has not presented this court with a Notice of Appearance.
2. Nathan Z. Kaufman has no fact to the Chapter 13 matter at hand.
3. Debtor objects to Paragraph 2, (a – e), 3, and 4 in its entirety, since there are no fact to the alleged failure:
 - a. Debtor made payment to the Chapter 13, Trustee required by 11 U.S.C. §1236(a)(1);
and
 - b. Debtor has corrected the Chapter 13 Plan and it is no longer Blank and
 - c. Debtor mailed a copy of a federal income tax return to the trustee before 7 days of the first meeting of creditors pursuant to 11 U.S.C §521(e)(2)(A)(i); and

d. Provided Trustee with all disclosure documentation as required by E.D.N.Y.

LBR 2003-1 and

e. Debtor appeared to be examined at the Section 341 Meeting of Creditors as required

by 11 U.S.C. §343

4. There are no prejudice to any rights of creditors, since there are no evidence of proof of any claim from any creditors showing that there are outstanding debts and that the alleged debt was not already cured.

WHEREFORE, the debtors respectfully request that the Application to Dismiss the Chapter 13 Bankruptcy be denied in its entirety and allowing the Chapter 13 case to continue as planned.

Date: Brooklyn, New York
October 10, 2023

Regards,

By: Anthony - Robert Kerr

Anthony-Robert Kerr, Attorney in Fact/Authorized Representative

ANTHONY KERR ESTATE, debtor